# Sealed

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS BROWNSVILLE DIVISION

JUN 3 0 2020

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

vs § CRIMINAL NO. 8-20-414

JUAN EDGAR HEREVIA

ALEJANDRO GONZALEZ

SEALED INDICTMENT

THE GRAND JURY CHARGES:

### **COUNT ONE**

On or about December 18, 2019, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

#### JUAN EDGAR HEREVIA,

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Americana Arms, in Beeville, Texas, a federally licensed firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, **JUAN EDGAR HEREVIA**, did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 (Firearms Transaction Record), in connection with the attempted acquisition of a firearm, stating that he was the actual buyer of a Barrett rifle, Model M82A1, .50 BMG caliber, serial number: AA008634, whereas in truth and in

fact, as he then and there knew, he was acquiring the firearm on behalf of another person, and he was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Section and 924(a)(1)(A) and Title 18, United States Code, Section 2.

# **COUNT TWO**

On or about December 18, 2019 in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

## **ALEJANDRO GONZALEZ,**

willfully caused, aided, abetted and induced JUAN EDGAR HEREVIA, a defendant in this indictment, to knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Americana Arms, in Beeville, Texas, a federally licensed firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that JUAN EDGAR HEREVIA did execute a United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 (Firearms Transaction Record), in connection with the attempted acquisition of a firearm, namely, a Barrett rifle, Model M82A1, .50 BMG caliber, serial number: AA008634, from Americana Arms, whereupon JUAN EDGAR HEREVIA knowingly stated and represented on the Form 4473, that he was the actual buyer of the firearm, when in truth and in fact, as ALEJANDRO GONZALEZ and JUAN EDGAR HEREVIA then and there knew, JUAN EDGAR HEREVIA was acquiring the firearm on behalf of another person, and he was not the

actual buyer of the firearm.

In violation of Title 18, United States Code, 924 (a)(1)(A) and Title 18, United States Code, Section 2.

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK UNITED STATES ATTORNEY

DAVID A. LINDENMUTH

Assistant United States Attorney